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IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAMES ESCANDON,

Defendants.

CASE NO. 1:23-CR-00222-JLT-SKO

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through her counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for a status conference on August 11, 2025. Dkt. 24. The parties have reached a plea agreement. Dkt. 25.

2. By this stipulation, defendant now moves to vacate the trial, schedule a change of plea of September 22, 2025, and to exclude time between August 11, 2025, and September 22, 2025, pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv).

3. The parties agree and stipulate, and request that the Court find the following:

a) Defense counsel has been on maternity leave and requires additional time to consult with her client prior to change of plea and prepare for sentencing. Accordingly, the Defendant requests this case be set for change of plea on September 22, 2025.

b) Additionally, September 22, 2025, is the earliest available date for the Court and both counsel, taking into account continuity of counsel and the exercise of reasonable diligence.

c) The government does not object to the continuance.

d) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendants in a trial within the original date prescribed by the Speedy Trial Act.

e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of August 11, 2025 to September 22, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv), because it results from a continuance granted by the Court at defendants' request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: July 31, 2025

MICHELE BECKWITH
Acting United States Attorney

/s/ ARIN C. HEINZ
ARIN C. HEINZ
Assistant United States Attorney

Dated: July 31, 2025

/s/ ALEKXIA L. TORRES STALLINGS
ALEKXIA L. TORRES STALLINGS
Counsel for Defendant
JAMES ESCANDON

FINDINGS AND ORDER

IT IS SO FOUND.

IT IS SO ORDERED.

Dated: **July 31, 2025**


UNITED STATES DISTRICT JUDGE